# IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA

MONROE TRUCK EQUIPMENT, INC., Plaintiff,

v.

SUPER LAWN TRUCK INC.,

Defendant.

Civil Action No. 5:25-cv-00194

**JURY TRIAL DEMANDED** 

## **COMPLAINT**

Plaintiff, Monroe Truck Equipment, Inc. ("Monroe Truck"), brings this action for patent infringement and trademark infringement against Defendant, Super Lawn Truck Inc. ("SLT"), and by and for its Complaint, alleges as follows:

# NATURE OF THE ACTION

- 1. This is an action for (i) patent infringement under the patent laws of the United States, namely, 35 U.S.C. §§ 101 et seq., 271, 281, and 284, among others; (ii) trademark infringement under the Lanham Act, 15 U.S.C. § 1125; (iii) common law trademark infringement; (iv) unfair competition under the Lanham Act, 15 U.S.C. § 1125; and (v) unfair competition under Georgia law.
- 2. Monroe Truck seeks a preliminary and permanent injunction and monetary damages stemming from SLT's infringement of Monroe Truck's U.S. Patent No. 12,172,695 (the "'695 Patent").

3. Monroe Truck seeks monetary damages and equitable relief in the form of an injunction both preliminarily and permanently enjoining SLT from using Monroe Truck's trademark in connection with the manufacture, distribution, advertising, promotion, offering for sale, and/or sale of SLT's goods.

# **PARTIES**

- 4. Monroe Truck is a Wisconsin corporation with its principal place of business located at 1051 West 7th Street, Monroe, WI 53566.
- 5. Upon information and belief, SLT is a Georgia corporation with its principal place of business at 1610 Peach Parkway, Fort Valley, Georgia, 31030.

# JURISDICTION AND VENUE

- 6. This Court has subject matter jurisdiction over the Lanham Act claims and patent infringement claims pursuant to 28 U.S.C. §§ 1331 and 1338, and 15 U.S.C. § 1121, as these claims arise under the laws of the United States.
- 7. This Court has supplemental jurisdiction over the claims in this action that arise under the law of the state of Georgia pursuant to 28 U.S.C. § 1367(a) because the state law claims are so related to the federal Lanham Act claims that they form a part of the same case or controversy and arise from a common nucleus of operative facts.

- 8. This Court has personal jurisdiction over SLT because it is a Georgia corporation with its principal place of business in Fort Valley, Georgia and because it has committed acts of infringement within this judicial district.
- 9. Venue is also proper in this district pursuant to 28 U.S.C. § 1400(b) because SLT has committed acts of patent infringement in this district and its principal place of business in this district, located in Fort Valley, Georgia.

## FACTS AND BACKGROUND

- 10. Monroe Truck is an industry-leading truck equipment manufacturer, upfitter, and distributor with over 60 years of work truck expertise. With a talented team of industry experts on its side, Monroe Truck offers unparalleled custom engineering, installation, manufacturing, and distribution of performance-driven municipal, commercial, and fleet vehicles. Monroe Truck's engineering and innovation continues through today.
- 11. Monroe Truck protects its valuable intellectual property by obtaining and enforcing various patent rights. On December 24, 2024, Monroe Truck's '695 Patent was duly and legally issued by the U.S. Patent & Trademark Office. A copy of the '695 Patent is attached as Exhibit A.
- 12. Monroe Truck is the owner by assignment of the entire right, title, and interest in the '695 Patent.

- 13. The '695 Patent is in full force and effect as of the date of this Complaint and all times relevant to the allegations herein.
- 14. After the priority date of the '695 Patent, Monroe Truck began manufacturing and distributing a line of catalytic converter guards for protecting catalytic converters on motor vehicles. Monroe Truck's catalytic converter guards practice the '695 Patent.
- 15. Monroe Truck sells its catalytic converter guards in connection with the name "Cat Cage" (the "CAT CAGE Mark")
- 16. Monroe Truck has invested significant time, energy, and resources in promoting and offering its catalytic converter guards under the CAT CAGE Mark. Monroe Truck has used the CAT CAGE Mark since at least August 2020.
- 17. As a result of these investments and efforts, Monroe Truck has developed substantial and valuable goodwill in its CAT CAGE Mark and owns strong common law rights in its CAT CAGE Mark across the United States relating to catalytic converter guards, including in Georgia.
- 18. Monroe Truck's CAT CAGE Mark is proprietary, highly valuable, and an important asset of Monroe Truck's.
- 19. Monroe Truck has priority of use over SLT with respect to the CAT CAGE Mark.

- 20. The CAT CAGE Mark is not merely descriptive and has acquired secondary meaning.
- 21. In August 2020, after the priority date of the '695 Patent, SLT purchased 70 catalytic converter guard kits from Monroe Truck. Instead of continuing its relationship with Monroe Truck, SLT developed its own knockoff of Monroe Truck's catalytic converter guards and is now selling catalytic converter guards under a trademark exceedingly similar to the CAT CAGE Mark. SLT's catalytic converter guard is currently available for sale by SLT at the following URL: https://superlawntrucks.com/project/slt-cat-cage/.
- 22. SLT's catalytic converter guards infringe one or more claims of the '695 Patent literally and/or through the doctrine of equivalents. A claim chart showing how SLT's catalytic converter guards practice every element of the claims of the '695 Patent is attached as Exhibit B.
- 23. On July 18, 2023, Monroe Truck sent a letter to SLT that provided actual notice of the publication of the application that issued as the '695 Patent. The letter informed SLT that its catalytic converter guards would infringe claims that issue from the published application. The letter also provided notice to SLT that it was infringing Monroe Truck's CAT CAGE Mark.

- 24. On January 9, 2025, Monroe Truck sent a letter to SLT that provided actual notice of the '695 Patent and SLT's infringement thereof. The letter also provided notice that SLT is continuing to infringe Monroe Truck's CAT CAGE Mark.
- 25. In a deliberate effort to benefit from Monroe Truck's reputation and trade on its valuable common law rights, goodwill, and consumer trust and recognition, SLT uses its exceedingly similar trademark on its product, on its website, and on product literature, among other uses. Examples of which are depicted below.



# SLT Cat Cage for select Isuzu and Chevrolet cab forward chassis trucks

Prevent theft of EXPENSIVE catalytic converters! Protect your assets now!

**\$795.00/each + shipping** 

Add to Cart



26. Monroe Truck has never authorized any use of the CAT CAGE Mark by SLT in any manner.

# **CAUSES OF ACTION**

# COUNT I: Infringement of U.S. Patent No. 12,172,695

- 27. Monroe Truck incorporates by reference the allegations contained in paragraphs 1–26 as if separately repeated herein.
- 28. Under 35 U.S.C. § 271(a), SLT has infringed and continues to infringe, literally or under the doctrine of equivalents, Monroe Truck's '695 Patent by making, using, selling, and offering for sale in the United States, or importing

into the United States, products that embody the invention covered by the '695 Patent.

- 29. Upon information and belief, SLT has profited from its infringement of the '695 Patent.
- 30. Monroe Truck has sustained damages as a direct and proximate result of SLT's infringement of the '695 Patent and is entitled to damages pursuant to 35 U.S.C. §§ 284 and 289.
- 31. SLT's infringement has caused, and unless enjoined by this Court under 35 U.S.C. § 283, will continue to cause Monroe Truck to suffer irreparable harm for which it cannot be adequately compensated by a monetary award.
- 32. SLT had knowledge of the '695 Patent and of SLT's infringement thereof at least as early as January 9, 2025.
- 33. SLT had knowledge of the published application that issued as the '695 Patent and SLT's infringement thereof at least as early as July 18, 2023.
  - 34. SLT's infringement of the '695 Patent has been willful.

# COUNT II:

# Infringement of Unregistered Trademark – Lanham Act

35. Monroe Truck incorporates by reference the allegations contained in paragraphs 1–34 as if separately repeated herein.

- 36. Monroe Truck owns the distinctive CAT CAGE Mark for catalytic converter guards.
- 37. Monroe Truck's ownership and exclusive use in commerce of the CAT CAGE Mark for catalytic converter guards predates SLT's unauthorized use of the CAT CAGE Mark.
- 38. SLT's unauthorized use of the CAT CAGE Mark in interstate commerce wrongly and falsely designates, describes, or represents SLT's products, and is likely to cause confusion, mistake, and deception as to the affiliation, connection, or association of SLT's catalytic converter guard with Monroe Truck, or as to the sponsorship or approval of SLT's products by Monroe Truck.
- 39. Consumers seeing SLT's use of such a confusingly similar mark in the marketplace are likely to believe that SLT's products are the same as Monroe Truck's or sponsored by, associated with, or otherwise affiliated with Monroe Truck.
- 40. SLT's actions therefore violate Monroe Truck's rights in its CAT CAGE Mark and constitute trademark infringement and unfair competition in violation of 15 U.S.C. § 1125(a).
- 41. SLT's infringing activities are knowing, willful, and intentional violations of Monroe Truck's rights.

- 42. SLT's acts of trademark infringement and unfair competition, unless restrained, will cause great and irreparable harm to Monroe Truck and to the goodwill represented by Monroe Truck's CAT CAGE Mark, in an amount that cannot be ascertained at this time, leaving Monroe Truck with no adequate remedy at law.
- 43. Monroe Truck is thus entitled to injunctive relief restraining SLT from any further acts of trademark infringement and unfair competition, as well as recovery of Monroe Truck's costs and reasonable attorneys' fees under 15 U.S.C. §§ 1116, 1117, and 1125.

# COUNT III: Common Law Trademark Infringement

- 44. Monroe Truck incorporates by reference the allegations contained in paragraphs 1–43 as if separately repeated herein.
- 45. Monroe Truck owns the distinctive CAT CAGE Mark for catalytic converter guards.
- 46. Monroe Truck's ownership and exclusive use in commerce of the CAT CAGE Mark for catalytic converter guards predates SLT's unauthorized use of the CAT CAGE Mark.
- 47. SLT's unauthorized use of the CAT CAGE Mark wrongly and falsely designates, describes, or represents SLT's products, and is likely to cause

confusion, mistake, and deception as to the affiliation, connection, or association of SLT's catalytic converter guard with Monroe Truck, or as to the sponsorship or approval of SLT's products by Monroe Truck.

- Consumers seeing SLT's use of such a confusingly similar mark in 48. the marketplace are likely to believe that SLT's products are the same as Monroe Truck's or sponsored by, associated with, or otherwise affiliated with Monroe Truck.
- 49. SLT's actions therefore violate Monroe Truck's rights in its CAT CAGE Mark and constitute trademark infringement and unfair competition.
- 50. SLT's infringing activities are knowing, willful, and intentional violations of Monroe Truck's rights.
- 51. SLT's acts of trademark infringement and unfair competition, unless restrained, will cause great and irreparable harm to Monroe Truck and to the goodwill represented by Monroe Truck's CAT CAGE Mark, in an amount that cannot be ascertained at this time, leaving Monroe Truck with no adequate remedy at law.
- 52. Monroe Truck is thus entitled to injunctive relief restraining SLT from any further acts of trademark infringement and unfair competition, as well as recovery of Monroe Truck's costs and reasonable attorneys' fees.

# **COUNT IV:** Unfair Competition – Lanham Act

- 53. Monroe Truck incorporates by reference the allegations contained in paragraphs 1–52 as if separately repeated herein.
- 54. SLT's actions constitute unfair competition under the Lanham Act, 15 U.S.C. § 1125.
- 55. SLT has used the CAT CAGE Mark to market, sell or offer for sale products that infringe Monroe Truck's intellectual property rights.
- 56. Consumers purchase SLT's products believing they are purchasing legitimate Monroe Truck products, or products that originate from, are associated with, or are connected with Monroe Truck, or otherwise have the sponsorship, endorsement, or approval of Monroe Truck.
- 57. SLT therefore utilizes Monroe Truck's trademarks to unfairly compete with Monroe Truck and/or redirect sales to SLT for products that would have otherwise been directed to Monroe Truck.
- 58. SLT's unfair competition with Monroe Truck was, and is, done willfully, maliciously, and/or with an intentional disregard of Monroe Truck's rights.
- 59. As a direct and proximate result of SLT's wrongful actions, Monroe Truck has suffered, and continues to suffer, damage and loss.

60. SLT has irreparably injured Monroe Truck. Such irreparable injury will continue unless SLT is enjoined by this Court from further violation of Monroe Truck's rights, for which Monroe Truck has no adequate remedy at law.

# **COUNT V:** Unfair Competition – Georgia Code

- 61. Monroe Truck incorporates by reference the allegations contained in paragraphs 1–60 as if separately repeated herein.
- 62. SLT's actions constitute unfair competition Georgia law, including under Georgia Code § 13-8-34 et seq.
- 63. SLT has used the CAT CAGE Mark to market, sell or offer for sale products that infringe Monroe Truck's intellectual property rights.
- 64. Consumers purchase SLT's products believing they are purchasing legitimate Monroe Truck products, or products that originate from, are associated with, or are connected with Monroe Truck, or otherwise have the sponsorship, endorsement, or approval of Monroe Truck.
- 65. SLT therefore utilizes Monroe Truck's trademarks to unfairly compete with Monroe Truck and/or redirect sales to SLT for products that would have otherwise been directed to Monroe Truck.

- 66. SLT's unfair competition with Monroe Truck was, and is, done willfully, maliciously, and/or with an intentional disregard of Monroe Truck's rights.
- As a direct and proximate result of SLT's wrongful actions, Monroe 67. Truck has suffered, and continues to suffer, damage and loss.
- SLT has irreparably injured Monroe Truck. Such irreparable injury 68. will continue unless SLT is enjoined by this Court from further violation of Monroe Truck's rights, for which Monroe Truck has no adequate remedy at law.

## PRAYER FOR RELIEF

WHEREFORE, Monroe Truck seeks the following relief:

- An entry of judgment in Monroe Truck's favor and against SLT on all A. Counts of this Complaint;
- В. An order enjoining, temporarily, preliminarily and permanently, SLT, and each of its respective officers, agents, servants, employees, and attorneys, and all of those persons in active concert or participation with it, from infringing the '695 Patent;
- C. An award of damages adequate to compensate Monroe Truck for the patent infringement that occurred pursuant to 35 U.S.C. § 284, together with

prejudgment interest and costs and reasonable attorneys' fees, pursuant to 35 U.S.C. §§ 284 and 285;

Case 5:25-cv-00194-MTT

- D. An award of provisional rights damages under 35 U.S.C. § 154(d);
- E. An order determining that SLT's patent infringement is willful and an enhancement of damages up to three times during the period of willful infringement;
- F. An order declaring this an exceptional case and awarding Monroe Truck its attorneys' fees and costs in accordance with 35 U.S.C. § 285;
- G. A declaration that SLT's trademark infringement and unfair competition have been willful and that this case is exceptional;
- H. An order enjoining, temporarily, preliminarily and permanently, SLT, and each of its respective officers, agents, servants, employees, and attorneys, and all of those persons in active concert or participation with it from using the CAT CAGE Mark or any mark that is confusingly similar thereto;
- I. An order that SLT be required to pay Monroe Truck any profits SLT derived from its trademark infringement and unfair competition;
- J. An order that SLT be required to pay Monroe Truck its actual damages resulting from SLT's trademark infringement and unfair competition; and
  - K. Such other relief as the Court may deem just and proper.

# JURY DEMAND

Monroe Truck demands a trial by jury on all issues properly tried to a jury.

This 13th day of May, 2025.

## /s/ Neil A. Brunetz

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## CERTIFICATE OF COMPLIANCE

Counsel for Defendant hereby certifies that the forgoing has been prepared with one of the font and point selections approved by the Court in LR 5.1(C): Times New Roman (14 point).

This 13th day of May, 2025.

## /s/ Neil A. Brunetz

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# **EXHIBIT A**

# (12) United States Patent

### Nommensen et al.

#### US 12,172,695 B2 (10) Patent No.:

#### (45) Date of Patent: Dec. 24, 2024

#### (54) CATALYTIC CONVERTER GUARD

(71) Applicant: Monroe Truck Equipment, Inc., Monroe, WI (US)

Inventors: Daniel Nommensen, Monroe, WI (US);

Eric Falsey, Monroe, WI (US)

Assignee: Monroe Truck Equipment, Inc.,

Monroe, WI (US)

Subject to any disclaimer, the term of this (\*) Notice:

patent is extended or adjusted under 35

U.S.C. 154(b) by 0 days.

(21) Appl. No.: 17/896,509

(22)Filed: Aug. 26, 2022

(65)**Prior Publication Data** 

US 2023/0061602 A1 Mar. 2, 2023

#### Related U.S. Application Data

(60) Provisional application No. 63/238,374, filed on Aug. 30, 2021.

(51) **Int. Cl.** 

B62D 21/10 (2006.01)B62D 25/20

(2006.01)

(52) U.S. Cl.

CPC ....... B62D 21/10 (2013.01); B62D 25/2009 (2013.01)

(58) Field of Classification Search

CPC .... B62D 21/10; B62D 25/2009; B62D 21/00; B62D 21/02; B62D 21/155; B60R 25/00;

F01N 3/10; F01N 3/24

See application file for complete search history.

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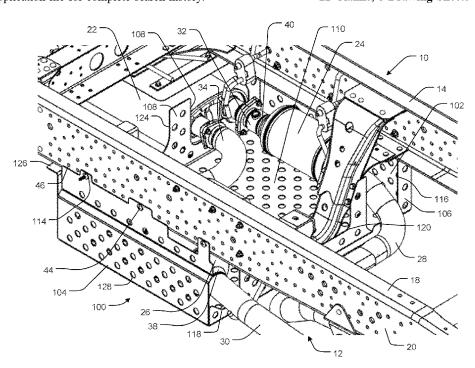
<sup>\*</sup> cited by examiner

Primary Examiner — Joseph D. Pape (74) Attorney, Agent, or Firm — Quarles & Brady LLP

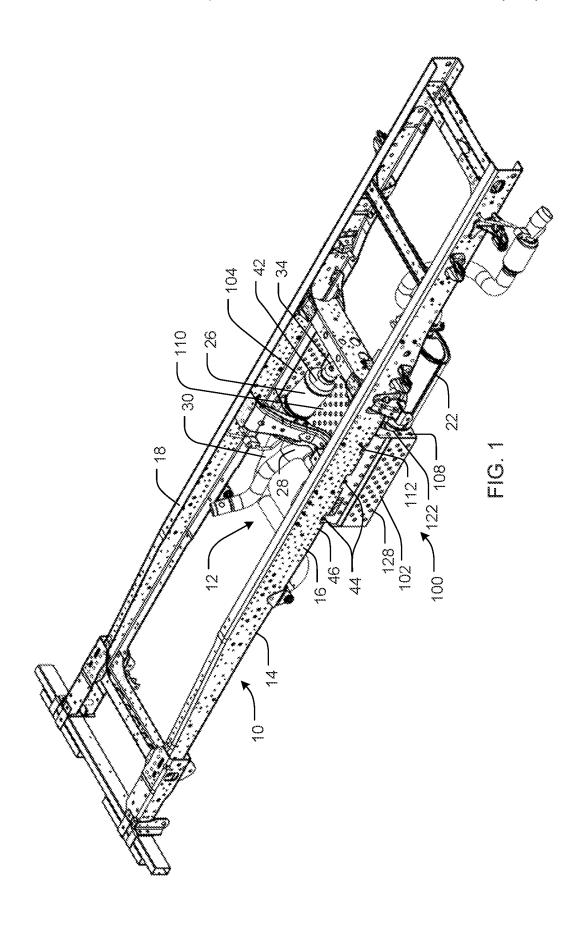
#### (57)ABSTRACT

A catalytic converter guard for protecting a catalytic converter on a motor vehicle. The catalytic converter guard can include a set of mounting flanges, an input guard plate, an output guard plate, and a bottom plate coupled to the set of mounting flanges and the input and output guard plates. The set of mounting flanges can be configured to be coupled to a set of frame rails of a motor vehicle. The input guard plate can be configured to be positioned adjacent an input of at least one catalytic converter and can include at least one cutout shaped to permit at least one input exhaust pipe to pass therethrough. The output guard plate can be configured to be positioned adjacent an output of the at least one catalytic converter and can include at least one cutout shaped to permit at least one output exhaust pipe to pass therethrough.

### 21 Claims, 8 Drawing Sheets



U.S. Patent Dec. 24, 2024 Sheet 1 of 8 US 12,172,695 B2

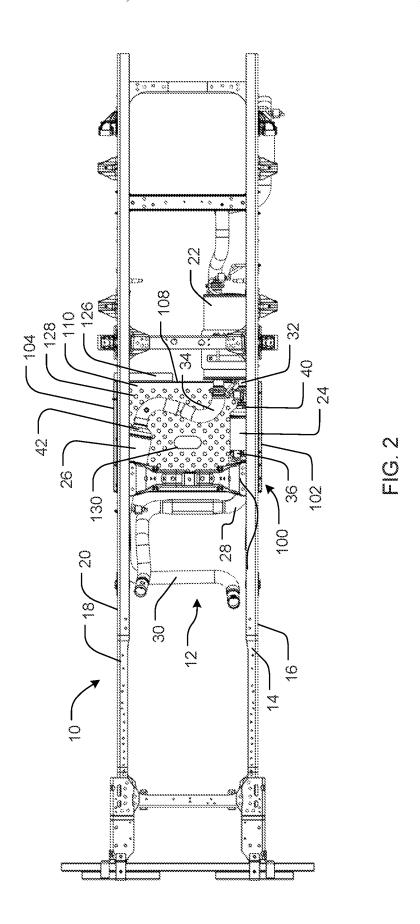


U.S. Patent

Dec. 24, 2024

Sheet 2 of 8

US 12,172,695 B2

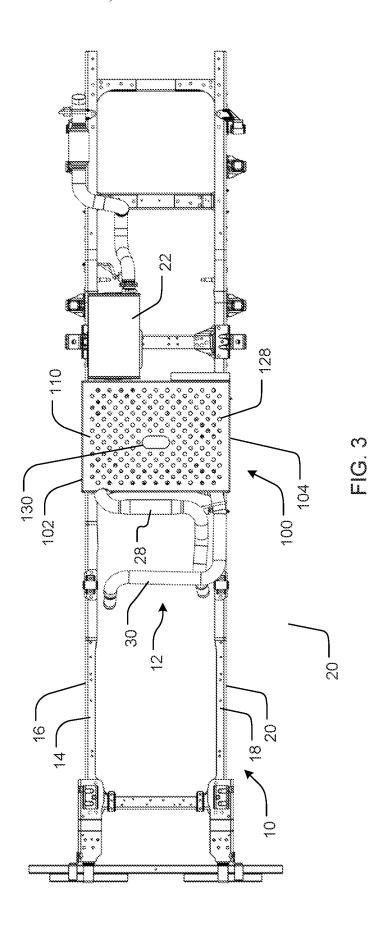


U.S. Patent Dec. 2

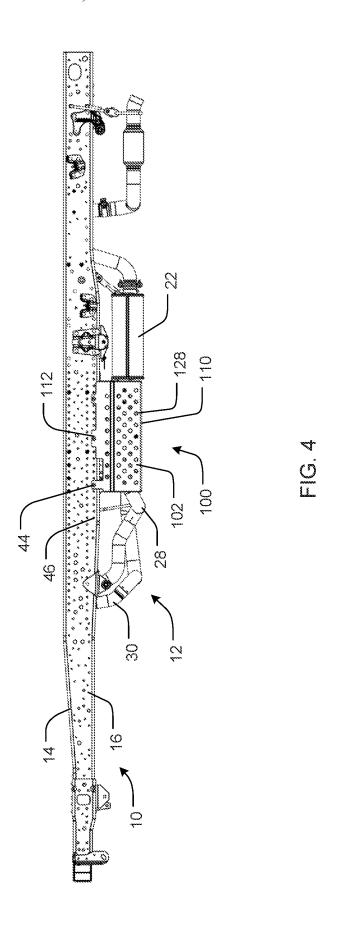
Dec. 24, 2024

Sheet 3 of 8

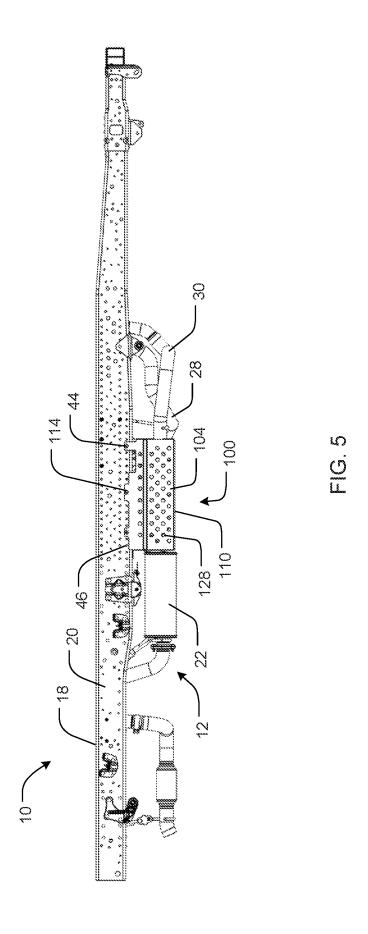
US 12,172,695 B2



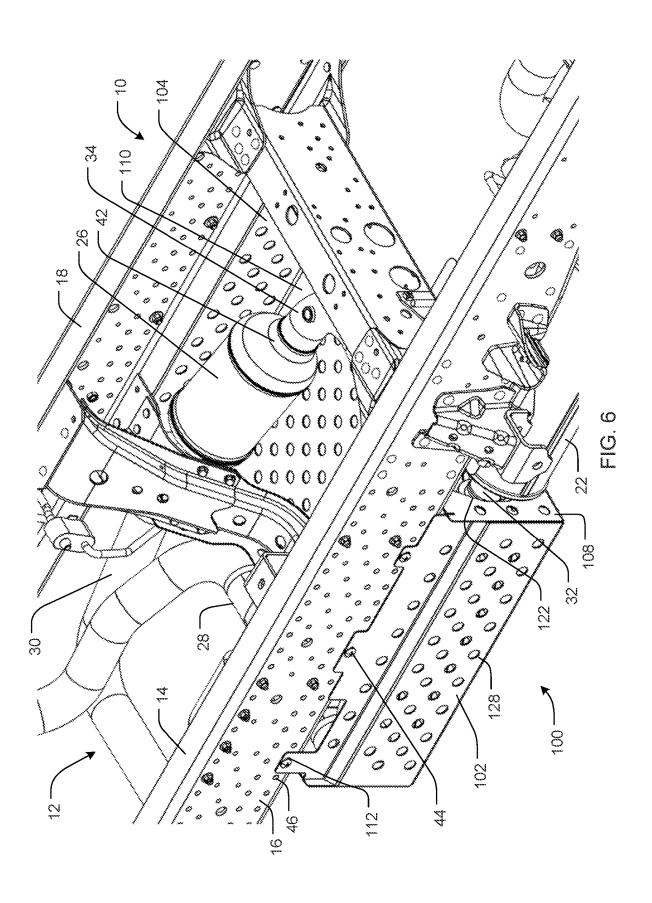
U.S. Patent Dec. 24, 2024 Sheet 4 of 8 US 12,172,695 B2



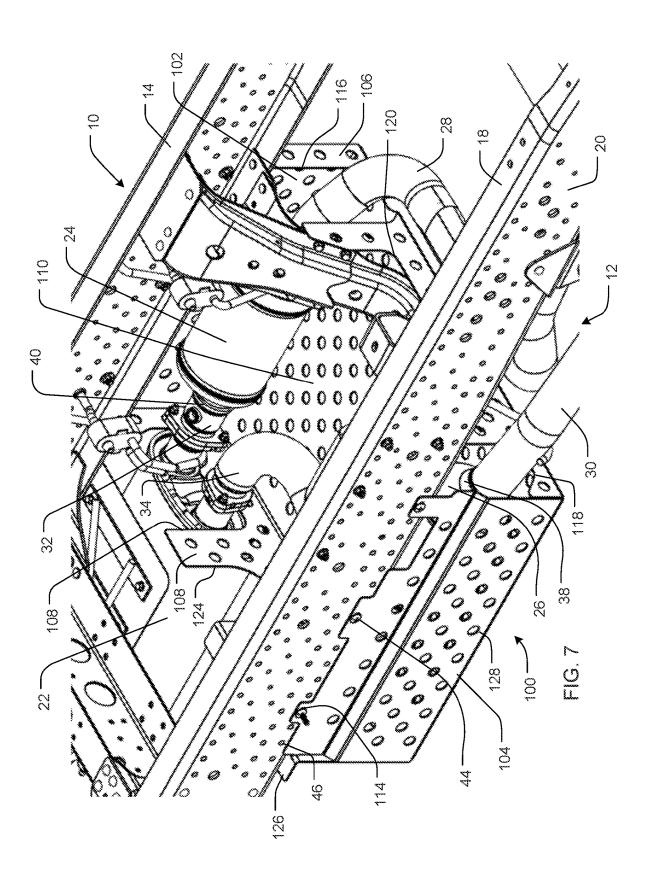
U.S. Patent Dec. 24, 2024 Sheet 5 of 8 US 12,172,695 B2



U.S. Patent Dec. 24, 2024 Sheet 6 of 8 US 12,172,695 B2



U.S. Patent Dec. 24, 2024 Sheet 7 of 8 US 12,172,695 B2



U.S. Patent Dec. 24, 2024 Sheet 8 of 8 US 12,172,695 B2

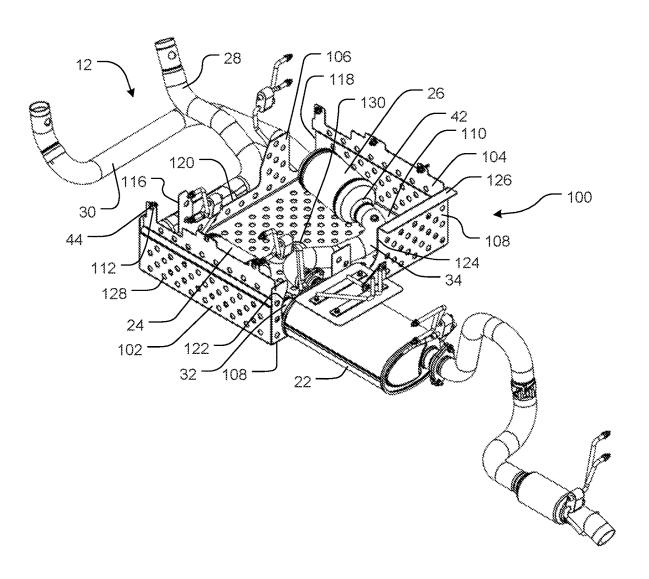


FIG. 8

### 1 CATALYTIC CONVERTER GUARD

#### CROSS-REFERENCE TO RELATED APPLICATIONS

This application claims priority to U.S. Provisional Patent Application No. 63/238,374, filed Aug. 30, 2021, titled "Catalytic Converter Guard," the entirety of which is incorporated herein by reference.

#### BACKGROUND

Catalytic convertors are an important component of a motor vehicle's exhaust system. They aid in converting harmful substances in a motor vehicle's exhaust gases, like carbon monoxide, nitric oxide, nitrogen dioxide, and hydrocarbons into less harmful substances such as carbon dioxide and water vapor through catalysis using precious metals such as platinum, palladium, and rhodium. Catalytic con- 20 verters are typically located underneath the body of the motor vehicle and can therefore be fairly easily accessible, including for unauthorized personnel.

#### **SUMMARY**

Some embodiments of the invention provide a catalytic converter guard for protecting a catalytic converter on a motor vehicle. The catalytic converter guard can include a set of mounting flanges, an input guard plate, an output 30 guard plate, and a bottom plate coupled to the set of mounting flanges, the input guard plate, and the output guard plate. The set of mounting flanges can be configured to be secured to a set of frame rails of a motor vehicle. The input guard plate can be configured to be positioned adjacent an  $^{35}$ input of at least one catalytic converter and can include at least one cutout shaped to permit at least one input exhaust pipe to pass therethrough. The output guard plate can be configured to be positioned adjacent an output of the at least one catalytic converter and can include at least one cutout shaped to permit at least one output exhaust pipe to pass therethrough. The bottom plate can be configured to extend beneath the catalytic converter.

Some embodiments can provide a catalytic converter 45 guard system for protecting a catalytic converter on a motor vehicle. The catalytic converter guard system can include a set of mounting flanges, a bottom plate coupled to extending between the set of mounting flanges, and a plurality of tamper-resistant fasteners. The set of mounting flanges can 50 be configured to be coupled to a set of frame rails of a motor vehicle with the plurality of tamper-resistant fasteners. The bottom plate can be configured to extend beneath the catalytic converter.

Some embodiments can provide a catalytic converter 55 guard for protecting a catalytic converter on a motor vehicle. The catalytic converter guard can include a five-sided box including four side walls and a bottom wall. Two of the four sidewalls can be configured to be secured to a set of frame rails of the motor vehicle.

#### BRIEF DESCRIPTION OF THE DRAWINGS

The accompanying drawings, which are incorporated in and form a part of this specification, illustrate embodiments 65 of the invention and, together with the description, serve to explain the principles of embodiments of the invention:

2

FIG. 1 is a rear top left isometric view of a catalytic converter guard according to an embodiment of the invention installed on a motor vehicle frame with an exhaust

FIG. 2 is a top plan view of the frame, exhaust system, and catalytic converter guard of FIG. 1;

FIG. 3 is a bottom plan view of the frame, exhaust system, and catalytic converter guard of FIG. 1;

FIG. 4 is a left elevation view of the frame, exhaust 10 system, and catalytic converter guard of FIG. 1;

FIG. 5 is a right elevation view of the frame, exhaust system, and catalytic converter guard of FIG. 1;

FIG. 6 is a close-up rear top left isometric view of the frame, exhaust system, and catalytic converter guard shown

FIG. 7 is a close-up front top right isometric view of the frame, exhaust system, and catalytic converter guard shown in FIG. 1; and

FIG. 8 is a rear top left isometric view of the exhaust system and the catalytic converter guard of FIG. 1 shown in

#### DETAILED DESCRIPTION

Before any embodiments of the invention are explained in detail, it is to be understood that the invention is not limited in its application to the details of construction and the arrangement of components set forth in the following description or illustrated in the following drawings. The invention is capable of other embodiments and of being practiced or of being carried out in various ways. Also, it is to be understood that the phraseology and terminology used herein is for the purpose of description and should not be regarded as limiting. The use of "including," "comprising," or "having" and variations thereof herein is meant to encompass the items listed thereafter and equivalents thereof as well as additional items. Unless specified or limited otherwise, the terms "mounted," "connected," "supported," and "coupled" and variations thereof are used broadly and encompass both direct and indirect mountings, connections, supports, and couplings. Further, "connected" and "coupled" are not restricted to physical or mechanical connections or couplings.

Also as used herein, unless otherwise specified or limited, directional terms are presented only with regard to the particular embodiment and perspective described. For example, reference to features or directions as "horizontal," "vertical," "front," "rear," "left," "right," "upper," "lower," and so on are generally made with reference to a particular figure or example and are not necessarily indicative of an absolute orientation or direction. However, relative directional terms for a particular embodiment may generally apply to alternative orientations of that embodiment. For example, "front" and "rear" directions or features (or "right" and "left" directions or features, and so on) may be generally understood to indicate relatively opposite directions or features for a particular embodiment, regardless of the absolute orientation of the embodiment (or relative orientation relative to environmental structures). "Lateral" and derivatives thereof generally indicate directions that are generally perpendicular to a vertical direction for a relevant reference

Also as used herein, ordinal numbers are used for convenience of presentation only and are generally presented in an order that corresponds to the order in which particular features are introduced in the relevant discussion. Accordingly, for example, a "first" feature may not necessarily have

3

any required structural or sequential relationship to a "second" feature, and so on. Further, similar features may be referred to in different portions of the discussion by different ordinal numbers. For example, a particular feature may be referred to in some discussion as a "first" feature, while a similar or substantially identical feature may be referred to in other discussion as a "third" feature, and so on.

The following discussion is presented to enable a person skilled in the art to make and use embodiments of the invention. Various modifications to the illustrated embodiments will be readily apparent to those skilled in the art, and the generic principles herein can be applied to other embodiments and applications without departing from embodiments of the invention. Thus, embodiments of the invention are not intended to be limited to embodiments shown, but are to be accorded the widest scope consistent with the principles and features disclosed herein. The following detailed description is to be read with reference to the figures, in which like elements in different figures have like 20 reference numerals. The figures, which are not necessarily to scale, depict selected embodiments and are not intended to limit the scope of embodiments of the invention. Skilled artisans will recognize the examples provided herein have many useful alternatives and fall within the scope of 25 embodiments of the invention.

As generally noted above, catalytic converters are typically installed in relatively accessible locations on vehicles. Unfortunately, it has become more and more common for catalytic converters to be forcibly removed from motor 30 vehicles because of the scrap value of the precious metals. Due to the relative ease of access to areas below a vehicle chassis, a thief can simply crawl under a motor vehicle and remove a catalytic converter from the exhaust system by cutting the input and output exhaust pipes on either side of 35 the catalytic converter.

Correspondingly, in some contexts, it may be useful to protect a catalytic converter on a motor vehicle from being forcibly removed (e.g., via sawing the exhaust pipes on either end). Further, it may be useful to be able to install a 40 catalytic converter guard on a motor vehicle as an aftermarket add-on. Embodiments of the invention can be useful for this purpose, and others. For example, embodiments of the invention can be used to cover a catalytic converter to prevent removal of the catalytic converter if both ends are 45 cut from their connection with the exhaust system. As another example, some embodiments of the invention can be positioned around the catalytic converter from below the motor vehicle and secured to the frame with fasteners. In some embodiments, the fasteners can be tamper-resistant 50 fasteners, which may require special tools for removal.

In some embodiments, a catalytic converter guard can include a set of mounting flanges that are configured to be secured to the frame of a motor vehicle. In some embodiments, the mounting flanges have holes for receiving fas- 55 teners that can also be received in holes in a frame of the motor vehicle. In some embodiments, the catalytic converter guard can have guard plates positioned to the front and the rear of the catalytic converter, wherein front and rear positions with respect to the catalytic converter are in relation to 60 the front and rear of the motor vehicle. In some embodiments, the catalytic converter guard can have a bottom plate adjoining the mounting flanges and the guard plates and extending underneath the catalytic converter. The mounting flanges, guard plates, and bottom plate can be formed to 65 accommodate various shapes, sizes, and locations of the catalytic converter and frame members.

4

In some contexts, it may be useful to provide a catalytic converter guard that accommodates components of the drivetrain. In some embodiments, cutouts in the catalytic converter guard can be provided to fit around drivetrain components, such as, for example, transmissions, transfer cases, and/or driveshafts. In some embodiments, openings in a bottom plate of a catalytic converter guard can be provided to allow access to components of the drivetrain for servicing, for example, grease fittings.

In some embodiments, a catalytic converter guard can be configured to reduce the drag imposed on the motor vehicle, as compared to conventional arrangements. For example, apertures can be provided throughout to allow air to pass through the catalytic converter guard. The apertures can also aid in removing heat from exhaust gasses passing through the catalytic converter. Additionally, the removal of material from a catalytic converter guard reduces the weight. The reduction of drag and weight can increase fuel efficiency, as compared to a catalytic converter guard according to the disclosure without material removed.

In some conventional arrangements, catalytic converter protective devices are configured to accommodate a single catalytic converter through a secured clamp or a similarly dimensioned cage. Thus, two catalytic converter protective devices are needed if the motor vehicle has two catalytic converters. This would likely require additional installation time to install two conventional, single, catalytic converter cages. Additionally, individual cage-like catalytic converter protective devices do not extend between frame members and may thus require securing the protective device to a body panel, such as, for example, a floor board. This can increase the likelihood for water penetration at the fastening locations and eventually lead to the floor board (or other body panel) rusting out at those locations. Further, a catalytic converter protective device dimensioned similarly to a catalytic converter is limited to the size of catalytic converter it can protect.

Some embodiments of the invention can address this issue, or others. For example, some embodiments of the invention are presented below in the context of a catalytic converter guard for protecting one or more catalytic converters, wherein the catalytic converter guard extends between and across frame members and effectively encloses the one or more catalytic converter(s) therebetween. Further, the catalytic converter guard can accommodate many different sizes and shapes of catalytic converters, while also accommodating other relevant components (e.g., flow pipes for the relevant exhaust system). Generally, the principles disclosed herein can be used with any variety of catalytic converter configuration.

With regard to construction, various embodiments can be readily formed from a variety of known manufacturing techniques, including bending sheet metal. For example, some embodiments, including the embodiment illustrated in the FIGS., can be stamped as one piece and bent to form. In other embodiments, multiple pieces can be stamped and joined together through methods such as welding or with mechanical fasteners.

FIGS. 1 through 7 illustrate an embodiment of a catalytic converter guard 100 configured to be mounted to a frame 10 of a body-on-frame motor vehicle (not shown) with an exhaust system 12. It is contemplated, however, that in some embodiments, a catalytic converter guard with the same or similar elements and attributes could be configured to be installed on a motor vehicle with a unibody frame.

The frame 10 has a set of rails including a first rail 14 with an outward facing side 16 and a second rail 18 with an

5

outward facing side 20 (shown in FIG. 7). The exhaust system 12, shown here as an example exhaust system, has a muffler 22; a set of catalytic converters, including a first catalytic converter 24 and a second catalytic converter 26, a set of input exhaust pipes, including a first input exhaust pipe 28 and a second input exhaust pipe 30; and a set of output exhaust pipes, including a first output exhaust pipe 32 and a second output exhaust pipe 34. The first input exhaust pipe 28 extends between an exhaust manifold (not shown) and a first end 36 of the first catalytic converter 24, and the second input exhaust pipe 30 extends between an exhaust manifold (not shown) and a first end 38 of the second catalytic converter 26. The first output exhaust pipe 32 is coupled to and between a second end 40 of the first catalytic  $_{15}$ converter 24 and the muffler 22, and the second output exhaust pipe 30 is coupled to and between a second end 42 of the second catalytic converter 26 and the muffler 22. It should be noted that the arrangement shown is one example of an exhaust system, other exhaust systems, including, for 20 example, systems with dual mufflers, systems with a single catalytic converter, and other similar configurations are contemplated for use with the catalytic converter guard 100.

Continuing, the catalytic converter guard 100 is shown catalytic converters 24, 26 in FIGS. 1-7. The catalytic converter guard 100 includes a set of mounting flanges, including a first mounting flange 102 and a second mounting flange 104; an input guard plate 106; an output guard plate 108; and a bottom plate 110. As shown, the first and second mounting flanges 102, 104; the input and output guard plates 106, 108; and the bottom plate 110 can be integrally formed from a single piece of sheet metal stamped and bent to form. However, in some embodiments, one or more of the parts of 35 the catalytic converter guard 100 may be welded or otherwise secured together, such as, for example with tamperresistant mechanical fasteners.

The form of the catalytic converter guard 100 can generally be a box-shape with four side walls (e.g., the first and 40 second mounting flanges 102, 104 and the input and output guard plates 106, 108), a bottom wall (e.g., the bottom plate 110), and an open top. Further, as shown in FIGS. 4 and 5, the catalytic converter guard 100 is sized to not decrease the ground clearance between the exhaust system 12 and the 45 ground. For example, the first and second mounting flanges 102, 104; the input and output guards 106, 108; and the bottom plate 110 do not extend below the muffler 22 or other exhaust components, other than the first and second catalytic converters 24, 26.

The catalytic converter guard 100 can be secured to the frame 10 to the first and second rails 14, 18 with tamperresistant fasteners 44. The first mounting flange 102 is positioned adjacent the outward facing side 16 of the first rail 14 and has a plurality of mounting holes 112 through 55 which the tamper-resistant fasteners 44 are received and which extend through holes 46 in the first rail 14 to secure the first mounting flange 102 to the first rail 14. Example tamper-resistant fasteners can include tamper-resistant Torx®-head fasteners, tamper-resistant drilled spanner-head 60 fasteners, and tamper-resistant one-way fasteners. (Torx® is a registered trademark of Acument Intellectual Properties, LLC in the United States or other jurisdictions.)

Similar to the first mounting flange 102, the second mounting flange 104 is positioned adjacent the outward 65 facing side 20 of the second rail 18 (shown in FIG. 7). The second mounting flange 104 also has a plurality of mounting

6

holes 114 through which tamper-resistant fasteners 44 are received and which extend through holes 46 in the second rail 18.

Continuing, the first and second mounting flanges 102, 104 can be formed to accommodate the size and shape of the catalytic converters 24, 26, respectively. For example, in the embodiment shown in the figures, each of the first and second mounting flanges 102, 104 are formed with an offset that extend inward toward the respective first and second rail 14, 18. The offset permits the first and second mounting flanges to extend outward from the first and second rails 14, 18 and beyond the first and second outward facing sides 16, 20 to accommodate portions of the first and second catalytic converters 24, 26 that extend beneath the first and second rails 14, 18 without interference. In particular, the offsets of the illustrated example are formed as outwardly angled portions of the flanges 102, 104, between parallel portions thereof above and below the angled portions, as may accommodate easy attachment to the rails 14, 18 as well as laterally protruding locations of the catalytic converters 24, 26. In other embodiments, however, other configurations are pos-

The input and output guard plates 106, 108 are shown in mounted to the frame 10 and enclosing the first and second 25 FIGS. 1 and 6-8. The input and output guard plates 106, 108 extend between the first and second mounting flanges 102, 104. The input guard plate 106 is positioned between the exhaust manifolds and the respective first ends 36, 38 (shown in FIGS. 2 and 7, respectively) of the first and second catalytic converters 24, 26. As shown, the input guard plate 106 is located adjacent (i.e., near, close to, or next to, but not necessarily touching) the first ends 36, 38 with the first and second input exhaust pipes 32, 34 located substantially exterior to the catalytic converter guard 100. Further, the input guard plate 106 can include a set of input cutouts, including a first input cutout 116 and a second input cutout 118. The first input cutout 116 is positioned adjacent the first end 36 of the first catalytic converter 24 and is shaped to permit the first input exhaust pipe 28 to pass therethrough. The second input cutout 118 is positioned adjacent the first end 38 of the second catalytic converter 26 and is shaped to permit the second input exhaust pipe 30 to pass therethrough. In some embodiments, more or fewer input cutouts can be provided depending on the configuration of the exhaust system.

> Further, a first drivetrain cutout 120 can be provided and configured to allow the catalytic converter guard 100 to fit around drivetrain elements, such as, for example, a transmission, a bell housing, a transfer case, one or more driveshafts, etc. (not shown). As shown, the first drivetrain cutout 120 is located between the first and second input cutouts 116, 118.

> Generally, cutouts on guard plates can be configured to accommodate passage of relevant exhaust system (or other) components, including as illustrated in the various FIGS. In some cases, a depth of cutouts can be sufficiently large so that a catalytic converter guard (e.g., the guard 100, as illustrated) can accommodate passage of the relevant components while not increasing the required clearance to ground relative to the relevant exhaust system without the guard, as also generally discussed above. Moreover, the cutouts on guard plates, including as shown for the cutouts 116, 118 122, can exhibit one or more maximum dimensions that are generally less than one or more corresponding maximum dimensions of a catalytic converter, so that even if all of the relevant exhaust pipes are cut, the catalytic converter may still not be removable via the cutouts.

Continuing, the output guard plate 108 is positioned between the second ends 40, 42 of the first and second catalytic converters 24, 26 and the muffler 22. As shown, the output guard plate 108 is located adjacent (i.e., near, close to, or next to, but not necessarily touching) the muffler 22 with the first and second output exhaust pipes 32, 34 located substantially inside the catalytic converter guard 100. In some embodiments, the catalytic converter guard 100 can be configured to route at least one of the first or second exhaust pipes 32, 34 substantially exterior thereto. Further, the output guard plate 108 can include an output cutout 122. The output cutout 122 is positioned adjacent the muffler 22 and is shaped to permit the first and second output exhaust pipes 32, 34 to pass therethrough. In some embodiments, more  $_{15}$ output cutouts can be provided depending on the configuration of the exhaust system.

Further, a second drivetrain cutout 124 can be provided and configured to allow room for a drivetrain element such as, for example, a driveshaft (not shown) to pass there- 20 through. As shown, the second drivetrain cutout 124 is located substantially equidistant between the first and second mounting flanges 102, 104.

Additionally, in some embodiments, the input guard plate 106 and/or the output guard plate 108 can have a stiffening 25 flange. For example, as shown in FIG. 8, the output guard plate 108 has a stiffening flange 126 extending between the output cutout 120 and the second mounting flange 104. The stiffening flange 126 increases the rigidity of the output guard plate 108 over this section.

Looking at FIGS. 2, 3, and 8, the first and second mounting flanges 102, 104 and the input and output guard plates 106, 108 are shown all coupled to the bottom plate 110. The bottom plate 110 can be a planar piece of material,  $_{35}$ however, other configurations are contemplated depending on the location of components of the motor vehicle drivetrain and the exhaust system to avoid interference therewith. The bottom plate 110 can include access features, for positioned below a location on the drivetrain for which access is required for routine maintenance (e.g., a grease fitting on a driveshaft).

Additionally, the catalytic converter guard 100 can include ventilation features to allow airflow therethrough. 45 As shown in FIG. 8, each of the first and second mounting flanges 102, 104; the input and output guard plates 106, 108; and the bottom plate 110 have a plurality of apertures 128. In some embodiments, the apertures 128 can have other shapes and sizes (e.g., elongate slots). The apertures 128 can 50 allow airflow through the catalytic converter guard 100 and allow the heat of exhaust gases to vent outward and away from underneath the motor vehicle. Further, the apertures 128 can provide a path for water or other debris to exit the catalytic converter guard 100. The apertures 128 can also 55 decrease the drag induced by the catalytic converter guard 100 as the motor vehicle is traveling, which otherwise could have an adverse effect on fuel efficiency.

In some implementations, devices or systems disclosed herein can be utilized or installed using methods embodying 60 aspects of the invention. Correspondingly, description herein of particular features or capabilities of a device or system is generally intended to inherently include disclosure of a method of using such features for intended purposes and of implementing such capabilities. Similarly, express dis- 65 cussion of any method of using a particular device or system, unless otherwise indicated or limited, is intended to

inherently include disclosure, as embodiments of the invention, of the utilized features and implemented capabilities of such device or system.

The previous description of the disclosed embodiments is provided to enable any person skilled in the art to make or use the invention. Various modifications to these embodiments will be readily apparent to those skilled in the art, and the generic principles defined herein may be applied to other embodiments without departing from the spirit or scope of the invention. Thus, the invention is not intended to be limited to the embodiments shown herein but is to be accorded the widest scope consistent with the principles and novel features disclosed herein.

What is claimed is:

- 1. A catalytic converter guard for protecting a catalytic converter on a motor vehicle, the catalytic converter guard
  - a set of mounting flanges;
  - an input guard plate;
  - an output guard plate; and
  - a bottom plate extending between the set of mounting flanges, the input guard plate, and the output guard plate;
  - with the catalytic converter guard installed on the motor vehicle, the set of mounting flanges are secured to outward facing sides of each frame rail of a set of frame rails of the motor vehicle;
  - the input guard plate is positioned adjacent an input of at least one catalytic converter and includes at least one cutout shaped to permit at least one input exhaust pipe to pass therethrough;
  - the output guard plate is positioned adjacent an output of the at least one catalytic converter and includes at least one cutout shaped to permit at least one output exhaust pipe to pass therethrough; and
  - the bottom plate extends beneath the at least one catalytic converter.
- 2. The catalytic converter guard of claim 1, wherein at least one of the mounting flanges includes an offset portion example, an access slot 130, which can be configured to be 40 configured to accommodate the at least one catalytic convertor positioned at least partially beneath one of the frame
  - 3. The catalytic converter guard of claim 1, wherein at least one of the set of mounting flanges, the input guard plate, the output guard plate, or the bottom plate have a plurality of apertures therein.
  - 4. The catalytic converter guard of claim 1, wherein at least one of the input guard plate or the output guard plate has a stiffening flange.
  - 5. The catalytic converter guard of claim 1, further comprising a set of tamper-resistant fasteners received in the set of mounting flanges and engaging the frame rails to secure the catalytic converter guard thereto.
  - 6. The catalytic converter guard of claim 1, wherein the bottom plate has an access slot for providing access to a drivetrain component of the motor vehicle.
  - 7. The catalytic converter guard of claim 1, wherein at least one of the input guard plate or the output guard plate has a cutout to accommodate a drivetrain component of the motor vehicle.
  - 8. The catalytic converter guard of claim 1, wherein the set of mounting flanges, the input guard plate, the output guard plate, and the bottom plate are integrally formed from a single sheet of metal.
  - 9. A catalytic converter guard system for protecting a catalytic converter on a motor vehicle, the catalytic converter guard system comprising:

9

- a set of mounting flanges;
- a bottom plate extending between the set of mounting flanges; and
- a plurality of fasteners;
- with the catalytic converter guard system mounted to the motor vehicle, the plurality of fasteners securing the set of mounting flanges to a set of frame rails of the motor vehicle, and the bottom plate extending beneath the catalytic converter, and
- at least one of the mounting flanges including an offset portion to position the catalytic convertor at least partially beneath a corresponding one of the frame rails.
- 10. The catalytic converter guard of claim 9, wherein at least one of the set of mounting flanges or the bottom plate  $_{15}$  has a plurality of apertures therein.
- 11. The catalytic converter guard of claim 9, wherein, with the catalytic guard system mounted to the motor vehicle, the set of mounting flanges are secured to outward facing sides of each of the frame rails.
- 12. The catalytic converter guard of claim 9, wherein the bottom plate has an access slot to provide access to a drivetrain component of the motor vehicle.
- 13. A catalytic converter guard for protecting a catalytic converter on a motor vehicle, the catalytic converter guard <sup>25</sup> comprising:
  - a box structure including side walls and a bottom wall; wherein, with the catalytic converter guard installed on the motor vehicle, two of the side walls are secured to outward facing sides of a set of frame rails of the motor <sup>30</sup> vehicle.
- 14. The catalytic converter guard of claim 13, wherein, with the catalytic converter guard installed on the motor vehicle, other two walls of the side walls accommodate the pass through of exhaust pipes.
- 15. The catalytic converter guard of claim 14, wherein, with the catalytic converter guard installed on the motor vehicle, the other two walls also accommodate the pass through of drivetrain elements.
- **16**. The catalytic converter guard of claim **13**, wherein the <sup>40</sup> bottom wall has an access slot to provide access to a drivetrain component of the motor vehicle.

#### 10

- 17. The catalytic converter guard of claim 13, wherein the side walls include four side walls, and the four side walls and the bottom wall are integrally formed from a single sheet of metal.
- 18. A motor vehicle comprising:
- a frame that includes a set of frame rails; and
- a catalytic converter guard that includes a box structure with side walls and a bottom wall;
- one or more of the side walls being secured with a mounting flange to an outward facing side of a corresponding frame rail of the set of frame rails to secure the box structure to the frame with a catalytic converter within the box structure.
- 19. The motor vehicle of claim 18, wherein the mounting flange includes an offset portion that aligns the box structure relative to the corresponding frame rail to position the catalytic convertor at least partially beneath the corresponding frame rail.
- 20. A catalytic converter guard system for protecting a catalytic converter on a motor vehicle, the catalytic converter guard system comprising:
  - a set of mounting flanges;
  - a bottom plate extending between the set of mounting flanges; and
  - a plurality of fasteners;
  - with the catalytic converter guard system mounted to the motor vehicle, the plurality of fasteners securing the set of mounting flanges to a set of frame rails of the motor vehicle, with the bottom plate extending beneath the catalytic converter and including a slot that provides access to a drivetrain component of the motor vehicle.
  - 21. The catalytic converter guard of claim 20, further comprising:
    - an input guard plate coupled to the bottom plate and including at least one cutout that receives at least one input exhaust pipe therethrough; and
    - an output guard plate coupled to the bottom plate and including at least one cutout that receives at least one output exhaust pipe therethrough;
    - wherein at least one of the input guard plate or the output guard plate has a cutout that receives a drivetrain component of the motor vehicle therethrough.

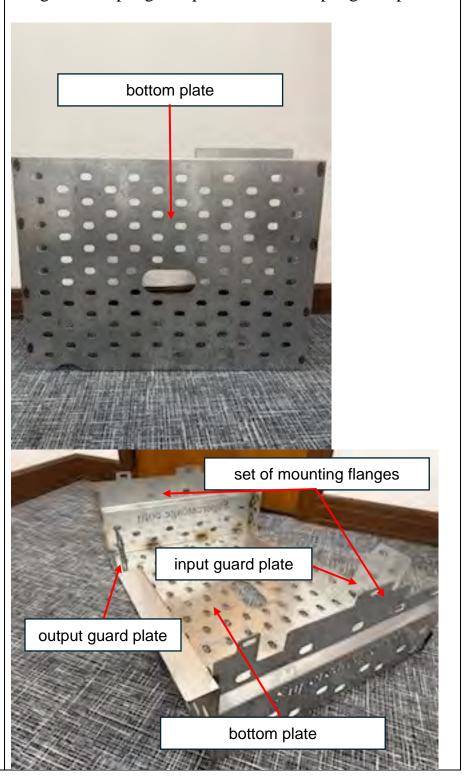
\* \* \* \* \*

# **EXHIBIT B**

U.S. Patent No. 12,172,695	Super Lawn Trucks Catalytic Converter Guard ("SLT Cat Cage")
1. A catalytic converter guard for protecting a catalytic converter on a motor vehicle, the catalytic converter guard comprising:	The SLT Cat Cage is a catalytic converter guard for protecting a catalytic converter on a motor vehicle.  See: SLT Cat Cage \$795.00   Super Lawn Trucks ("SLT Cat Cage for select Isuzu and Chevrolet cab forward chassis trucks Prevent theft of EXPENSIVE catalytic converters! Protect your assets now!"). See also: Isuzu Truck Owner Special Alert   Super Lawn Trucks.
a set of mounting flanges;	The SLT Cat Cage has a set of mounting flanges.  Set of mounting flanges

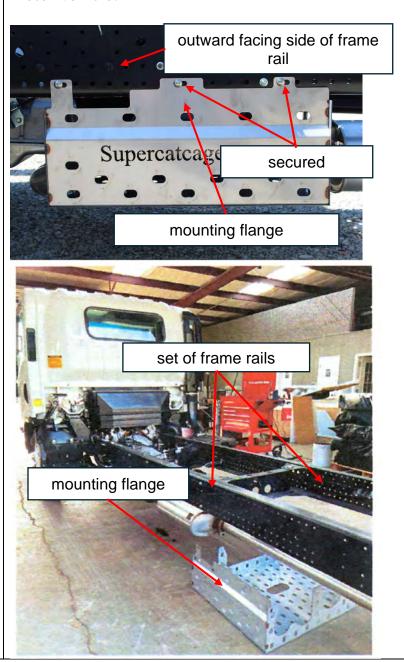


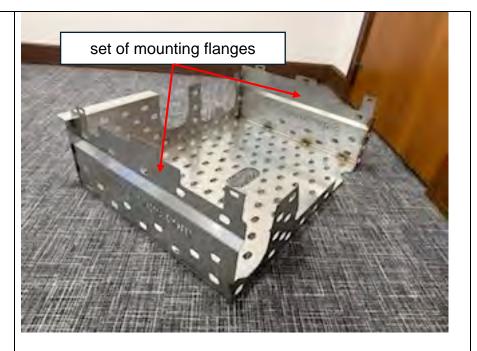
a bottom plate extending between the set of mounting flanges, the input guard plate, and the output guard plate; The SLT Cat Cage has a bottom plate. The bottom plate of the SLT Cat Cage extends between the set of mounting flanges, the input guard plate, and the output guard plate.



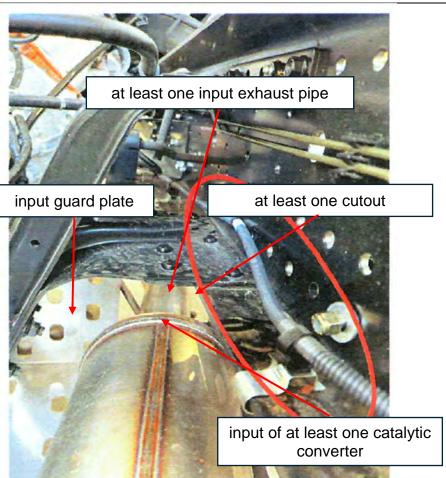
with the catalytic converter guard installed on the motor vehicle, the set of mounting flanges are secured to outward facing sides of each frame rail of a set of frame rails of the motor vehicle;

When installed on a motor vehicle, the set of mounting flanges of the SLT Cat Cage are secured to outward facing sides of each frame rails of a set of frame rails of the motor vehicle.

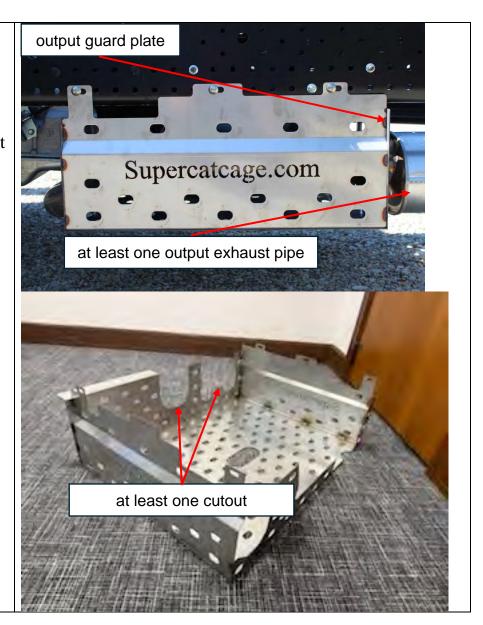




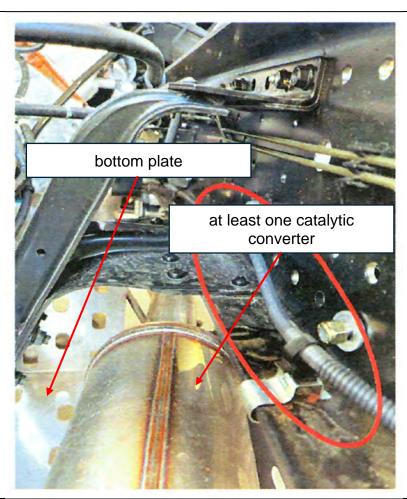
the input guard plate is positioned adjacent an input of at least one catalytic converter and includes at least one cutout shaped to permit at least one input exhaust pipe to pass therethrough;



the output guard plate is positioned adjacent an output of the at least one catalytic converter and includes at least one cutout shaped to permit at least one output exhaust pipe to pass therethrough; and



the bottom plate extends beneath the at least one catalytic converter.

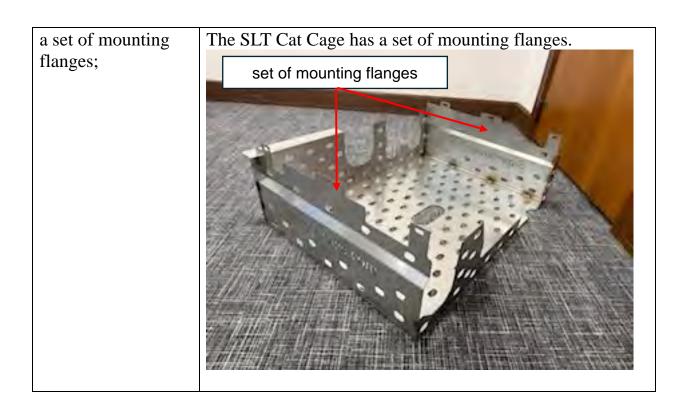


9. A catalytic converter guard system for protecting a catalytic converter on a motor vehicle, the catalytic converter guard system comprising:

The SLT Cat Cage is a catalytic converter guard system for protecting a catalytic converter on a motor vehicle.

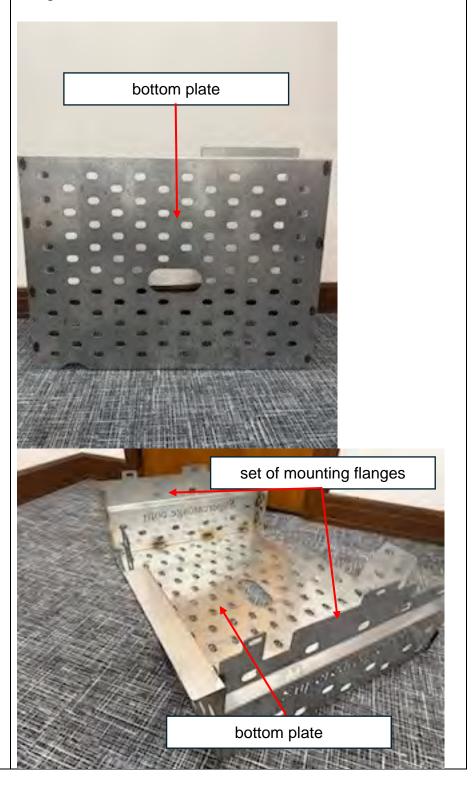
See: SLT Cat Cage \$795.00 | Super Lawn Trucks ("SLT Cat Cage for select Isuzu and Chevrolet cab forward chassis trucks

Prevent theft of EXPENSIVE catalytic converters! Protect your assets now!"). *See also*: <u>Isuzu Truck Owner Special</u> Alert | Super Lawn Trucks.



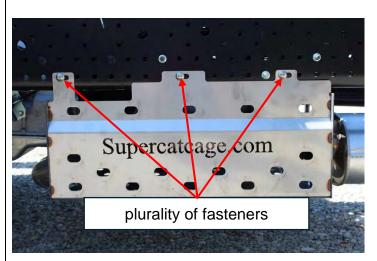
a bottom plate extending between the set of mounting flanges; and

The SLT Cat Cage has a bottom plate. The bottom plate of the SLT Cat Cage extends between the set of mounting flanges.



## a plurality of fasteners;

## The SLT Cat Cage includes a plurality of fasteners.



## Tools/Hardware:

A.6 9/16" Spanner Bolts B. 6 9/16" Washers C. 6 9/16" Lock Nuts

D.Spanner Bit

E. 1/2" Impact

F. 15/16" Deep Well Socket

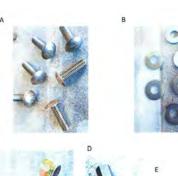
G.1/4" Impact Driver

H.9/16" Socket

I. 10" Swivel Extension

J. Floor Jack

K. Vise Grips

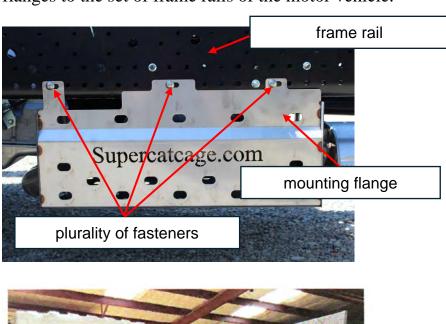


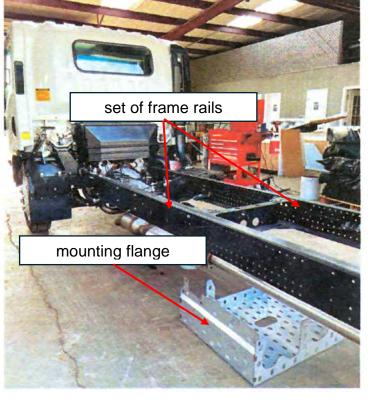




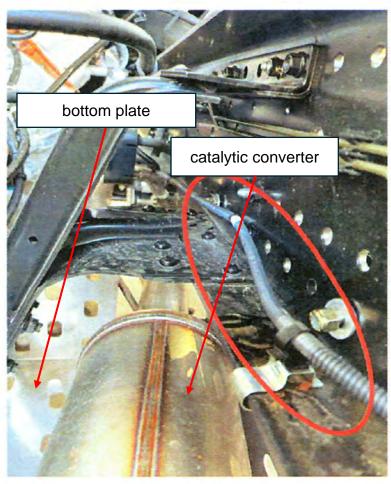


with the catalytic converter guard system mounted to the motor vehicle, the plurality of fasteners securing the set of mounting flanges to a set of frame rails of the motor vehicle, When the SLT Cat Cage is mounted to the motor vehicle it has a plurality of fasteners that secure the set of mounting flanges to the set of frame rails of the motor vehicle.



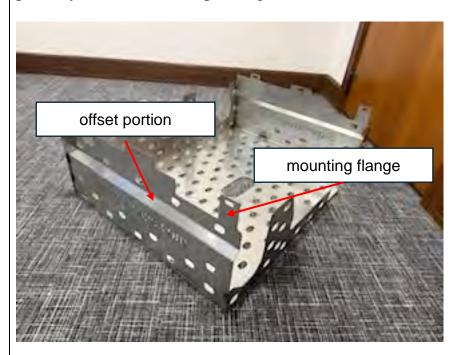


and the bottom plate extending beneath the catalytic converter, and When the SLT Cat Cage is mounted to the motor vehicle the bottom plate extends beneath the catalytic converter.



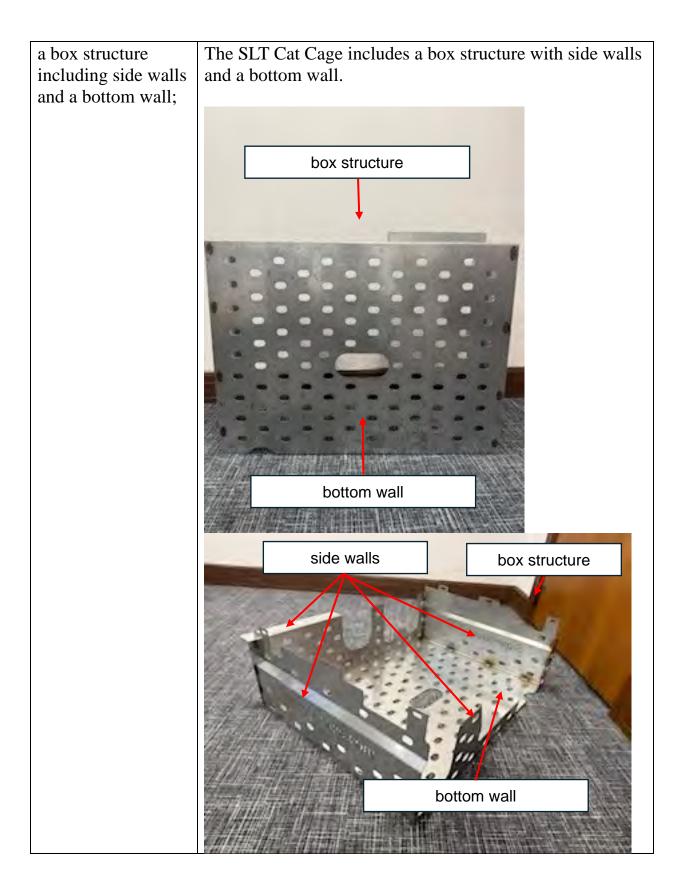
at least one of the mounting flanges including an offset portion to position the catalytic convertor at least partially beneath a corresponding one of the frame rails.

The mounting flanges of the SLT Cat Cage include an offset portion to position the catalytic convertor at least partially beneath a corresponding one of the frame rails.





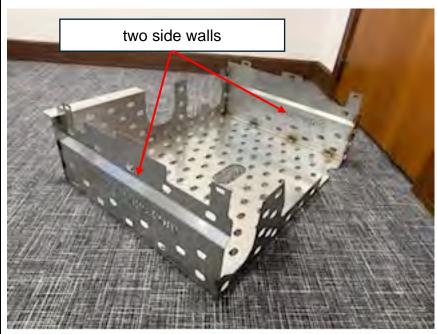
13. A catalytic	The SLT Cat Cage is a catalytic converter guard for
converter guard for	protecting a catalytic converter on a motor vehicle.
protecting a	
catalytic converter	See: SLT Cat Cage \$795.00   Super Lawn Trucks ("SLT
on a motor vehicle,	Cat Cage for select Isuzu and Chevrolet cab forward
the catalytic	chassis trucks
converter guard	Prevent theft of EXPENSIVE catalytic converters! Protect
comprising:	your assets now!"). See also: Isuzu Truck Owner Special
	Alert   Super Lawn Trucks.

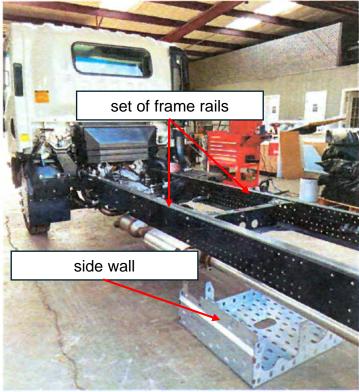


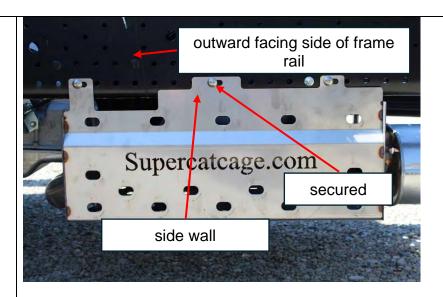
Page 15 of 21

wherein, with the catalytic converter guard installed on the motor vehicle, two of the side walls are secured to outward facing sides of a set of frame rails of the motor vehicle.

When installed on a motor vehicle, the SLT Cat Cage has two of the side walls that are secured to outward facing sides of a set frame rails.







20. A catalytic converter guard system for protecting a catalytic converter on a motor vehicle, the catalytic converter guard system comprising:

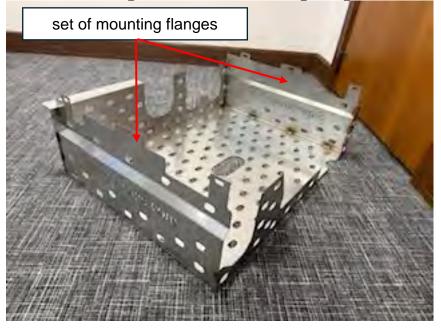
The SLT Cat Cage is a catalytic converter guard system for protecting a catalytic converter on a motor vehicle.

See: <u>SLT Cat Cage \$795.00 | Super Lawn Trucks</u> ("SLT Cat Cage for select Isuzu and Chevrolet cab forward chassis trucks

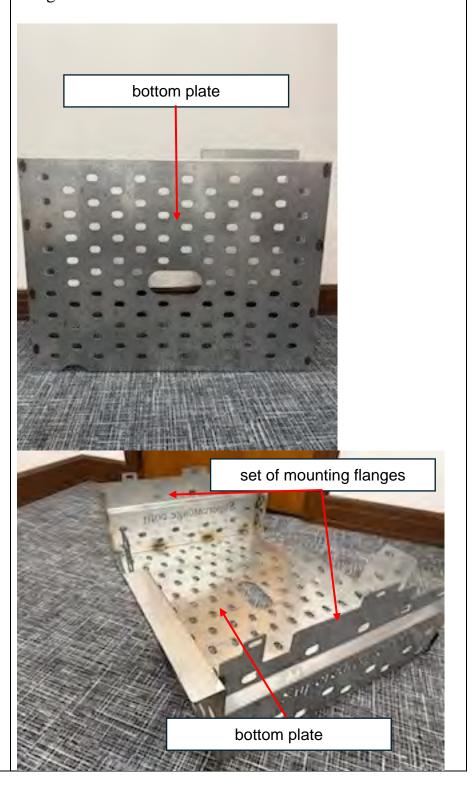
Prevent theft of EXPENSIVE catalytic converters! Protect your assets now!"). *See also*: <u>Isuzu Truck Owner Special</u> Alert | Super Lawn Trucks.

a set of mounting flanges;

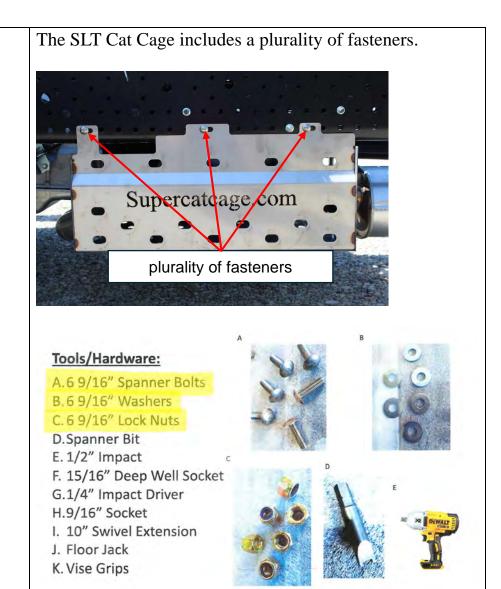
The SLT Cat Cage has a set of mounting flanges.



a bottom plate extending between the set of mounting flanges; and The SLT Cat Cage has a bottom plate. The bottom plate of the SLT Cat Cage extends between the set of mounting flanges.

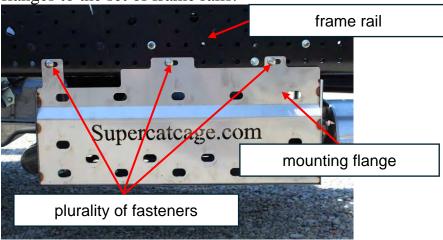


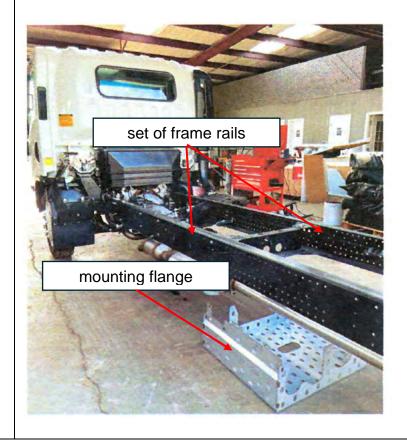
a plurality of fasteners;



with the catalytic converter guard system mounted to the motor vehicle, the plurality of fasteners securing the set of mounting flanges to a set of frame rails of the motor vehicle,

When the SLT Cat Cage is mounted to the motor vehicle it has a plurality of fasteners that secure the set of mounting flanges to the set of frame rails.





with the bottom plate extending beneath the catalytic converter and When the SLT Cat Cage is mounted to the motor vehicle the bottom plate extends beneath the catalytic converter.

